

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE FLUOR CORPORATION STOCKHOLDER  
DERIVATIVE LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 3:20-cv-01442-X

(Consolidated with Case Nos. 3:20-CV-  
01558-X and 3:21-CV-00353-X)

**LEAD PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF SETTLEMENT**

Lead Plaintiffs Jay Lee and Joan Goodman hereby move for preliminary approval of the settlement of this Action and respectfully request that the Court enter the proposed Order Preliminarily Approving Settlement and Setting Settlement Hearing (the "Preliminary Approval Order"), attached to the Stipulation and Agreement of Settlement ("Stipulation") as Exhibit A, and enclosed as a proposed order to this motion. The proposed Preliminary Approval Order: (i) grants preliminary approval of the Settlement; (ii) approves the form of the Notice, Summary Notice, and Postcard Notice attached to the Stipulation as Exhibits B-D; and (iii) sets a time and date for a final settlement hearing.

The grounds for the Motion are set forth in the accompanying Memorandum of Law in Support of Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement, and in the accompanying Declaration of Geoffrey M. Johnson in Support of Lead Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement (with its exhibits attached), being filed concurrently.

Dated: May 12, 2023

Respectfully Submitted,

**SCOTT+SCOTT ATTORNEYS  
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/s/ Geoffrey M. Johnson

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*Co-Lead Counsel for Texas Federal Court Lead  
Plaintiffs Jay Lee and Joan Goodman*

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 7.1, I hereby certify that a conference among all parties was held regarding the instant Motion and the instant Motion is unopposed.

/s/ Geoffrey M. Johnson

Geoffrey M. Johnson (admitted *pro hac vice*)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of May, 2023, the foregoing document was filed using the Court's CM/ECF system. In addition, (1) the filing is available for viewing and downloading via the CM/ECF system, and (2) the CM/ECF system will send notification of this filing to all attorneys of record who have registered for CM/ECF updates.

/s/ Geoffrey M. Johnson

Geoffrey M. Johnson (admitted *pro hac vice*)